

DISCOVERY PLAN WORKSHEET

Phase I (Pre-Settlement Discovery)

Deadline for completion of Rule 26(a) initial disclosures and any HIPAA-complaint records authorizations:

June 16, 2021

Completion date for Phase I Discovery as agreed upon by the parties:
(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)

August 18, 2021

Date for initial settlement conference:

(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)

September 14, 2021
2:00 p.m.

Phase II (Discovery and Motion Practice)

Motion to join new parties or amend the pleadings:
(Presumptively 15 days post initial settlement conference)

September 30, 2021

First requests for production of documents and for interrogatories due by:
(Presumptively 15 days post joining/amending)

October 7, 2021

All fact discovery completed by:
(Presumptively 3.5 months post first requests for documents/interrogatories)

January 31, 2022

Exchange of expert reports completed by:
(Presumptively 30 days post fact discovery)

March 2, 2022

Expert depositions completed by:
(Presumptively 30 days post expert reports)

April 4, 2022

COMPLETION OF ALL DISCOVERY BY:
(Presumptively 9 months after Initial Conference)

April 5, 2022

Final date to take first step in dispositive motion practice:
(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)

May 5, 2022

Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?

NO